

UNITED STATES DISTRICT COURT

United States District Court
Southern District of Texas
FILED

JUL 27 2016

for the

SOUTHERN DISTRICT OF TEXAS

United States of America)

v.)

David J. Bradley, Clerk

Case No. M-16-1410-M

Jaime Adalberto GALLEGOS-LICON (MXC)

YOB: 1978

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 7/26/2016 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

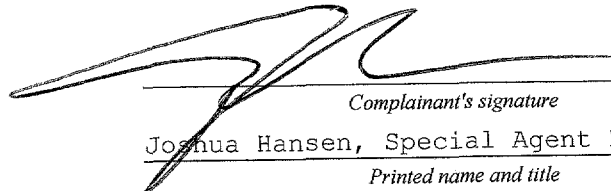
Offense Description

21 USC 841 (a) (1)

Possession with Intent to Distribute
Marijuana, approximately 155.00
kilograms, a schedule I controlled
substance.

This criminal complaint is based on these facts:

(See Attachment I).

☒ Continued on the attached sheet.Approved D. Paxton, TSA
MP
Complainant's signature
Joshua Hansen, Special Agent DEA
Printed name and title

Sworn to before me and signed in my presence.

Date: 7/26/2016 8:19 am
Judge's signatureCity and state: McAllen, TexasPeter E Ormsby, US Magistrate Judge
Printed name and title

ATTACHMENT I

1. On July 26, 2016, USBPA Tony Gonzalez was working linewatch operations in Rio Grande City, Texas. At approximately 6:45 PM, USBPA Gonzalez observed several subjects walking north from the US/Mexico border through brush carrying what appeared to bundles of marijuana. USBPA Gonzalez relayed the information through his service radio to nearby agents and advised them of the direction of travel of the suspected narcotics traffickers. USBP Agents Holbrok and Moreno responded to the area known as "The Hanger" in Rio Grande City, Texas and observed several subjects loading the bundles of suspected marijuana into a black Chevrolet Silverado pickup truck displaying TX/LP# GGC0247. The subjects ran immediately as soon as they saw the agents approaching the area. Some of the bundles were already loaded into the vehicle while others were still scattered in the nearby area. Agent Holbrok took custody of the driver later identified as Jaime Adalberto GALLEGOS-LICON who attempted to abscond through the pick-up truck's passenger side door because the driver's side door had jammed and wouldn't open.
2. USBPA Gonzalez requested a K-9 to the help search the area for additional bundles that may have still been in the brush. Agent O. Sanchez and his K-9 partner Roki arrived at the scene and found 2 additional bundles in the nearby area.
3. USBP Agent J. Moreno read GALLEGOS-LICON his Miranda rights at the scene and witnessed by Agent T. Gonzalez at approximately 7:00 PM.
4. The six (6) seized bundles of marijuana, the Chevrolet Silverado, and GALLEGOS-LICON were transported to the Rio Grande City, Texas Border Patrol Station for processing and storage. Once at the Rio Grande City Station, the content of the bundles was tested using the 908 Duquenois-Levine Reagent and the results were positive for marijuana. The total weight of the six bundles of marijuana was 155.00 kilograms.
5. At approximately 9:30 PM, DEA SA Joshua Hansen and TFO Ruben Duran arrived at the Rio Grande City Border patrol Station. At approximately 9:45 PM, TFO Duran read GALLEGOS-LICON his Miranda Warnings in Spanish. GALLEGOS-LICON waived his rights through written and verbal consent and agreed to be interviewed by agents. GALLEGOS-LICON began by telling agents that he had recently traveled from Monterey, Tamaulipas to Reynosa, Tamaulipas, Mexico and had paid approximately \$5,600 to be crossed into the United States. GALLEGOS-LICON reported that he was apprehended by US Border Patrol and was processed and subsequently departed back to Mexico where he congregated with several other deportees at the town square. GALLEGOS-LICON then stated that he was abducted, along with three other men, by four armed men and held at various locations throughout the Reynosa area for

approximately 15-20 days. During that time he was able to make multiple phone calls to his mother, however he did not alert her to his reported abduction. GALLEGOS-LICON then stated that on the afternoon of July 26, 2016, GALLEGOS-LICON was picked up by an unknown male from the home, where he was being held in Reynosa, supplied with a cellular telephone, and transported across the US/Mexico border by boat and taken to an unknown location in Rio Grande City. At the unknown location in Rio Grande City, GALLEGOS-LICON was told to drive the seized black Chevrolet pick-up and to follow another unidentified male to a location where the truck would be loaded with narcotics. GALLEGOS-LICON was also supplied a second cell phone at that time. GALLEGOS-LICON followed the unidentified male to the location of his arrest while in contact with the unidentified male via cell phone. GALLEGOS-LICON stated he made no attempt to call law enforcement for help once on his own in the Chevrolet Silverado and made no attempt to leave the situation despite being the sole occupant of the Chevrolet Silverado. GALLEGOS-LICON also tried to flee from law enforcement when USBP agents approached the location where the marijuana was being loaded in to the truck.